

## REMARKS

### I. Pre-Amendment Letter

In the Office Action, the Examiner has alleged that the Pre-Amendment Letter filed on April 23, 2002 is non-compliant. Applicant has amended the Brief Description of the Drawings in accordance with 37 CFR 1.121.

### II. 35 U.S.C. § 112, second paragraph

In the Office Action, the Examiner has rejected Claims 9-11 under 35 U.S.C. § 112, second paragraph. The Examiner contends that the phrase "said input key and said image signal" in Claim 9 lacks antecedent basis. Applicant has amended Claim 9 to provide proper antecedent basis for the above mentioned phrase. Thus, Applicant respectfully submits, that the Examiner's rejection of Claims 9-11 has been effectively traversed. Such action is earnestly solicited.

### III. 35 U.S.C. § 102(b)

In the Office Action, the Examiner has rejected Claims 1-14 under 35 U.S.C. § 102(b) as allegedly being anticipated by Rao et al., U.S. Patent 6,169,789. Applicant respectfully disagrees.

First, Applicant claims a combination wireless keyboard with a built-in web camera. In contrast, Rao et al. discloses an intelligent keyboard that can operate on a plurality of different apparatuses. The intelligent keyboard has a port which allows a digital camera to be coupled to the keyboard. The digital camera

is not built in to the keyboard. However, more importantly, a digital camera and a web camera are different input devices. A digital camera can only take a still image. The still image data is then transferred to the keyboard. In contrast, a web camera can send a continuous stream of video images to the keyboard. Applicant has amended Claim 1 to claim that the web camera receives and transmits a continuous stream of video data. This is neither shown nor described in Rao.

Since a continuous stream of data is being sent, Applicant uses two different input parts to receive and transfer the streaming data from the keyboard to the computer. Claim 1 discloses an input port for the web camera that has an image receiver for receiving an image signal. An image compressor is used for adjusting and compressing the image signal. An image signal divider is coupled to the image compressor for dividing the compressed image signal, based on data size of the compressed image signal and a predetermined data size for transmission, into a proper size based on the predetermined data size. A transmitter is provided for transmitting the divided image signal to a user terminal device. No where in Rao is an image signal divider for dividing the compressed image signal into a proper size disclosed. The Examiner contends that Rao in Figures 2-4 and Column 9, lines 54-column 10, line 10 that the above is shown and described. However, none of the figures show An image signal divider is coupled to the image compressor for dividing the compressed image signal, based on data size of the compressed image signal and a predetermined data

size for transmission, into a proper size based on the predetermined data size. Also, the specification cited by the Examiner just says that the keyboard can work with more than one device and that the devices can understand the data transmitted.

In independent Claim 8, Applicant has an image receiver for receiving a continuous image signal. An image compressor is used for adjusting and compressing the continuous image signal. A packet generator is used for receiving at least one of a group consisting of the input key data and the compressed continuous image signal and producing at least one packet according to a predetermined method. Again, nowhere in Rao is it disclosed or anticipated that the keyboard is able to receive and transmit a continuous video stream of data.

As the courts have ruled numerous times, anticipation does not exist unless a prior art reference shows each and every element, united in the same way to perform identical functions (emphasis added). *Penn Yan Boats, Inc. v. Sea Lark Boats, Inc.*, D.C.Fla. 1972, 359 F.Supp. 948, affirmed 479 F.2d 1328, certiorari denied 94 S.Ct. 66. See also, *Gillette Co. v. Warner-Lambert Co.*, D.Mass. 1988, 690 F.Supp. 115, and *B.W.B. Controls, Inc. v. U.S. Industries, Inc.*, E.D.La. 1985, 626 F.Supp. 1553, affirmed 802 F.2d 471. As Applicant has already stated in detail above, Rao fails to disclose many of the unique features which Applicant has claimed. Thus, Applicant respectfully submits the amendments to the Claims effectively traverses the Examiner's rejection of Claims 1-14 under 35 U.S.C. §102(b). Such action is earnestly solicited.

## V. Conclusion

Applicant respectfully submits that Applicant's claimed invention is deserving of patent protection because it describes a useful and functioning apparatus which is patentably distinguishable over the prior art.

In conclusion, Applicant respectfully submits that this Amendment Letter, including the amendments to the Claims, and in view of the Remarks offered in conjunction therewith, are fully responsive to all aspects of the objections and rejections tendered by the Examiner in the Office Action. Applicant respectfully submits that he has persuasively demonstrated that the above-identified Patent Application, including Claims 1-14 are in condition for allowance. Such action is earnestly solicited.

If the foregoing does not place the case in condition for immediate allowance, the Examiner is respectfully requested to contact the undersigned for purposes of a telephone interview.

If there are any fees incurred by this Amendment Letter, please deduct them from our Deposit Account NO. 23-0830.

Respectfully submitted,



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